

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SOUNDEXCHANGE, INC.,

Plaintiff,

v.

ACCURADIO, LLC,

Defendant.

Case No. \_\_\_\_\_

**PLAINTIFF SOUNDEXCHANGE, INC.'S  
MOTION FOR ENTRY OF PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff SoundExchange, Inc. (“SoundExchange” or “Plaintiff”) seeks entry of a preliminary injunction (i) enjoining Defendant AccuRadio, LLC (“AccuRadio” or “Defendant”) from engaging in wrongful conduct and continuing to deprive SoundExchange of statutorily required royalty payments; and/or (ii) providing SoundExchange reasonably adequate protection in the form of advance monthly payment on account of Defendant’s estimated usage of the statutory licenses and digital transmissions of sound recordings. A Memorandum of Law in Support is filed concurrently with this Motion.

*(Signatures on following page)*

Dated: July 19, 2024.

Respectfully submitted,

**THOMPSON HINE LLP**

/s/ Micah Fishman

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